

2 JUNE 1947

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I N D E X  
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EXHIBITS

| <u>Doc.</u><br><u>No.</u> | <u>Def.</u><br><u>No.</u> | <u>Pros.</u><br><u>No.</u> | <u>Description</u>   | <u>For</u><br><u>Ident.</u> | <u>In</u><br><u>Evidence</u> |
|---------------------------|---------------------------|----------------------------|--|-----------------------------|------------------------------|
| 1686                      | 2677                      |                            | Certificate of Authenticity<br>by the Chief of the<br>Archives Section of the<br>First Demobilization<br>Bureau of an Imperial<br>Headquarters Order to<br>the Commander of the<br>Kwantung Army, dated 3<br>December 1941 re immediate<br>settlement of the China<br>Affair, limiting border<br>conflicts, etc. |                             | 23351                        |
| 1146                      | 2678                      |                            | Affidavit of HANAWA, Gikei   |                             | 23390                        |
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1 Monday, 2 June 1947

2 - - -

3  
4 INTERNATIONAL MILITARY TRIBUNAL  
5 FOR THE FAR EAST  
6 Court House of the Tribunal  
7 War Ministry Building  
8 Tokyo, Japan

9 The Tribunal met, pursuant to adjournment,  
10 at 0930.

11 - - -

12 Appearances:

13 For the Tribunal, same as before.

14 For the Prosecution Section, same as before.

15 For the Defense Section, same as before.

16 - - -

17 (English to Japanese and Japanese  
18 to English interpretation was made by the  
19 Language Section, IMTFE.)  
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1 MARSHAL OF THE COURT: The International  
2 Military Tribunal for the Far East is now in  
3 session.

4 THE PRESIDENT: Major Blakeney.

5 MR. BLAKENEY: Upon reading the transcript  
6 of proceedings for 29 May, I have become aware  
7 for the first time of the statement of the Presi-  
8 dent in connection with the affidavit of TANABE  
9 Moritake (p. 25,298), that "Unless he is cross-  
10 examined, his ... evidence may be of no value."  
11 This being precisely the state of affairs which we  
12 have feared, I wish again to point out that whereas  
13 the prosecution, with the stupendous resources of  
14 the most powerful nations of the earth at their dis-  
15 posal, can at will pick and choose which witnesses  
16 they will produce, the defence have no such power.  
17 On the other hand, the prosecution have every power  
18 and facility for submission of interrogatories for  
19 obtaining their own affidavits, and can in no way  
20 be thought precluded from cross-examining a witness.  
21

22 "The case of TANABE bears no resemblance  
23 to those of the witnesses whom the Soviet authori-  
24 ties, holding prisoner in Siberia, elected not to  
25 bring into the court-room and place in the witness-  
box for cross-examination. The defence took the

TANAKA, S.

DIRECT

1 only step available to it -- by praying exercise  
2 of the compulsory power of the Tribunal -- to pro-  
3 duce the witness. Its prayer having been denied,  
4 it in no way acquiesces in any suggestion that the  
5 credibility of its witnesses or the weight of their  
6 testimony is affected by the absence of cross-  
7 examination.

8 THE PRESIDENT: A Member of the Tribunal  
9 thinks that those observations are superfluous and  
10 malicious, and he is not the Member from the U.S.S.R.

11 - - -

12 S H I N I C H I T A N A K A, called as a witness  
13 on behalf of the defense, resumed the stand  
14 and testified further through Japanese inter-  
15 preters as follows:

16 MR. BLAKENEY: I understand that in hear-  
17 ing his affidavit read the witness TANAKA, now in  
18 the box, detected some inaccuracies, which he would  
19 like to correct. I therefore ask that he be handed  
20 the original of exhibit 2,276 and be permitted to  
21 point out the places in question.

22 (Thereupon, a document was handed to  
23 the witness.)

24 THE WITNESS: I shall point out the mis-  
25 takes. One, under section 4 on the first page:

TANAKA, S.

DIRECT

1 "At the beginning of November, 1940, the  
2 Chief of the Army General Staff (in command of the  
3 entire General Staff and responsible for the deploy-  
4 ment of forces for national defence)"--

5 THE MONITOR: Mr. Blakeney, I think we had  
6 better have this witness write it out; otherwise it  
7 is impossible to follow it.

8 MR. BLAKENEY: I wonder if the only correc-  
9 tion is in the date.

10 THE MONITOR: He is adding about two or  
11 three sentences.

12 THE WITNESS: I wish to state the portion  
13 in parenthesis, beginning with "the Chief of the  
14 General Staff" to "the Vice-Chief" has been dropped  
15 in this copy.

16 I wish to state the next inaccuracy. This  
17 is "(4)."

18 MR. BLAKENEY: Page 3 of the English.

19 THE INTERPRETER: Yes, page 3 of the English.

20 THE WITNESS: The following passage was  
21 omitted in the reading of the affidavit: "In case  
22 of a Soviet-Japanese war the danger of war prosecu-  
23 tion will be confronted" -- that has been dropped.

24 THE INTERPRETER: Mr. Blakeney, we have  
25 just been informed that the English copy has these

TANAKA, S.

DIRECT

1 conditions. Apparently they are missing in the  
2 Japanese copy of the affidavit.

3 MR. BLAKENEY: If all the corrections are  
4 of that type, I believe it is a matter which can  
5 be managed by preparing a revised Japanese copy;  
6 there is no use to take the time of the Tribunal  
7 with this.

## DIRECT EXAMINATION

8  
9 BY MR. BLAKENEY (Continued):

10 Q Are they all of that type, Mr. Witness?

11 A In addition, paragraph 2, under (5), in-  
12 cludes a very serious error.

13 Q Please mention that one, then.

14 MR. BLAKENEY: Page 7 of the English.

15 A I shall mention the passage omitted. The  
16 passage omitted during the reading of my affidavit  
17 includes the following: It comes under sub-para-  
18 graph 2, in parenthesis, under 5, page 7 of the  
19 English affidavit: "The development of the German-  
20 Soviet war cannot be" --

21 THE MONITOR: Mr. Blakeney, do you have  
22 a better copy than this? We seem to be having diffi-  
23 culty reading it.

24 MR. BLAKENEY: My copy is bad, too.

25 This has been read in English and it is

TANAKA, S. .

DIRECT

1 unnecessary to read it again.

2 THE WITNESS: The entire paragraph begin-  
3 ning with "The development of the German-Soviet  
4 war cannot be so easily predicted" up to the next  
5 to the last sentence of the same paragraph.

6 MR. BLAKENEY: Very well, then. We under-  
7 stand that that was omitted in reading the Japanese  
8 and has now been supplied.

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TANAKA, s.

DIRECT

Q Is that all, Mr. Witness?

1 A Yes, they are all the mistakes, but I  
2 have refrained from pointing out two minor mistakes.

3 MR. BLAKENEY: We will see that the Japanese  
4 copy is correct.

5 THE PRESIDENT: We have spent 15 minutes  
6 not in correcting mistakes in substance but mistakes  
7 in copies.

8 MR. BLAKENEY: The absence of the order  
9 issued by Imperial Headquarters to the Commander-  
10 in-Chief of the Kwantung Army on the 3rd of December,  
11 1941, referred to in the testimony of the witness  
12 TANAKA on page 12 of his affidavit, Section 8 (1), is  
13 no doubt sufficiently accounted for by prosecution  
14 exhibit 831 already referred to. In addition,  
15 however, I now offer in evidence defense document  
16 1686, a certificate by the Chief of the Archives  
17 section of the First Demobilization Bureau, that the  
18 specific document is not now in the custody of that  
19 Bureau.

20 THE PRESIDENT: Admitted on the usual terms.

21 CLERK OF THE COURT: Defense document 1686  
22 will receive exhibit No. 2677.

23 (Whereupon, the document above  
24 referred to was marked defense exhibit  
25 No. 2677 and received in evidence.)

TANAKA, S.

1 MR. BLAKENEY: I shall not read the  
2 certificate.

3 You may cross-examine the witness.

4 THE PRESIDENT: Colonel Ivanov.

5 COLONEL IVANOV: Before beginning cross-  
6 examination I want to say the following: I refer  
7 the Honorable Tribunal to exhibits 779, 706, 708,  
8 721-A, 724, 638, 636, 655, 839, 830, 833, 834, 835,  
9 836, 838, 839, 667-A, 675-A, 684, 682, 686-A, 687,  
10 689 and 690. I also draw the Tribunal's attention  
11 to the fact that in the affidavit of witness TANAKA,  
12 Shinichi too much space is devoted to his own  
13 opinions and conclusions, and it is impossible to deal  
14 with all of them here.

15 It would be sufficient to point out one  
16 of such conclusions as an example. This is the  
17 last paragraph of the 6th Section of the affidavit,  
18 page 11 of the English translation. I am basing it  
19 on the general warnings which your Honor repeatedly  
20 addressed to the defense and the prosecution here in  
21 court, saying that the Tribunal would disregard  
22 as evidence the opinions and conclusions of witnesses.

23 Now I will start cross-examination.  
24  
25

TANAKA, S.

CROSS

## CROSS-EXAMINATION

1 BY COLONEL IVANOV:

2 Q Mr. Witness, you were appointed Chief of the  
3 1st Division of the General Staff by War Minister  
4 TOJO and Chief of the General Staff in October, 1940;  
5 was it so?

6 A I think I was appointed Chief of the 1st  
7 Division of the General Staff by the person who  
8 held the power of appointment, namely, the Minister  
9 of War.

10 Q Weren't you relieved from the post of the  
11 Chief of the 1st Division of the General Staff  
12 in 1942 because your views on the plans of war began  
13 to differ from this time from that of TOJO and  
14 SUGIYAMA?

15 A I do not know why I was dismissed from the  
16 position of the Chief of the 1st Division, but I did  
17 not think at all that I would be dismissed because  
18 of disagreement on matters pertaining to war guidance  
19 or war plans.

20 Q At any rate it is possible to say that in the  
21 period from October, 1940 to December, 1942 you had  
22 been Chief of the Operations Division of the General  
23 Staff and were directly connected with drafting and  
24 accomplishment of aggressive plans of Japan in China  
25



1 and the South Sea areas and in the north, and were  
2 doing this under the direction of SUGIYAMA and  
3 TOJO; is that so?

4 A It is a fact that I worked under both  
5 General TOJO and General SUGIYAMA, but I have never  
6 engaged in the formulation or in the prosecution --  
7 formulation of aggressive war plans or in the  
8 prosecution thereof.

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1 Q Mr. Witness, will you give a direct answer?  
2 Were the operation plans against the USSR in 1941 and  
3 1942, and also plans of war against Malaya, Java,  
4 Borneo and Netherland Indies and the Philippine  
5 Islands drafted under your supervision? Answer yes  
6 or no.

7 A It is a fact that I drew up operation plans  
8 by order of the chief of staff.

9 Q Mr. Witness, do you have at your disposal  
10 any documents bearing on the plan of the General Staff -  
11 operation plan of the General Staff of which you wrote  
12 in your affidavit? Can you produce such documents,  
13 or you have no such documents?

14 A I do not have any documents.

15 Q Thus, all that is written in your affidavit  
16 is the result of your speculations and is written from  
17 memory without real guarantee of it being correct,  
18 is that so?

19 A They are primarily written by my accurate  
20 memory.

21 Q In your affidavit you contend that Japan in  
22 1941 was threatened by the Soviet Union, is that so?  
23

24 A Yes.

25 Q Don't you think that when the German troops  
in the autumn of 1941 were attempting to seize Moscow

TANAKA, S

CROSS

1 and Leningrad, and German troops were near these  
2 cities, it was very strange even to think about it?

3 A Yes, there are reasons to think so.

4 Q And in 1942 when Germans reached Stalingrad  
5 and created a very grave danger for the Soviet Union  
6 in the west, was there any threat for Japan from the  
7 part of the USSR? Doesn't it contradict common sense?

8 A There are sufficient reasons why Japan felt  
9 a Soviet threat. Should I speak of them? Shall I  
10 state them?

11 Q Yes, please state them.

12 A The German-Soviet war in 1942 had entered  
13 a state of protracted attritional war as the result  
14 of the Soviet winter offensive. Japan on her part in  
15 her war against the United States and Britain entered  
16 upon extreme and serious difficulties following the  
17 defeat at Midway in June 1942. In this period the  
18 military alignment among the United States, Britain  
19 and the USSR was very strong and we feared and esti-  
20 mated in accordance with the situation then existing  
21 that either the USSR alone, or the USSR combined with  
22 the United States may attack Japan from the north.

23 Q You are answering not my question concerning  
24 the estimation of the situation of the USSR on the  
25 west, but some other question. You are speaking about

TANAKA, S

CROSS

1 a period which is beyond the time limit about which  
2 we speak now. The Germans were defeated at Stalingrad  
3 in December -- in November-December 1942, and this  
4 was known as a turning point of the war. Will you  
5 tell me was the period up to the end of 1942 very hard  
6 for the Soviet Union, wasn't it?

7 A Yes, it was a difficult period, but the  
8 Soviet-German war was already a protracted war.

9 Q Do not you in your affidavit give conclusions  
10 of the chief of the General Staff of Japan which say,  
11 that it is very unlikely that the USSR will start  
12 war against Japan by August 1942? This estimation --  
13 you give this estimation in your affidavit?

14 A That is so and the chief of the General Staff  
15 entertained such an opinion at the beginning of August.  
16 But that is an estimate that it will be -- that the  
17 danger would be relaxed tentatively or temporary  
18 because of winter and the freezing in the north would  
19 prevent any active warfare -- active operations.

20 Q Do you know that in July 1941 Japan took  
21 decision to start secret preparations for a war  
22 against Soviet Union?  
23

24 A I do not recall of any secret preparations  
25 for war against the USSR at present -- just now.

Q I will read to you an excerpt from exhibit

TANAKA, S

CROSS

1 No. 779. This is a resolution adopted at the  
2 Imperial Conference July 2, 1941. It reads as  
3 follows:

4 "Though the spirit of the tripartite axis  
5 will form the keynote of our attitude toward the  
6 German-Soviet War, we shall not intervene for a while,  
7 but take voluntary measures by secretly preparing arms  
8 against the Soviet Union."

9 I will read one more excerpt from this  
10 resolution.

11 "Meanwhile, diplomatic negotiations will be  
12 continued with detailed precautions; and should the  
13 conditions of the German-Soviet war progress favourable  
14 to Japan we shall execute arms to solve the northern  
15 problems, thereby securing stability in the Northern  
16 regions."

17 Do you know that decision?

18 A Yes, I heard of that decision from the chief  
19 of staff at that time.

20 Q Why then you answered me that you didn't  
21 know about any secret preparations for a war against  
22 Soviet Union in 1941? Does the memory fail you?

23 A That is not a mistake in memory. I received  
24 the explanation from the chief of staff at that time  
25 that the decision did not relate to a preparation for  
war against the Soviet Union.



TANAKA, S.

CROSS

1 Q Will you tell me, Mr. Witness, were the  
2 preparative measures for a war against the Soviet Union,  
3 known as Kan-tokuen, carried out from July, 1941, on  
4 the basis of this decision taken at the Imperial  
5 conference?

6 A The so-called Kan-tokuen of July, 1941, is  
7 not preparation for war against the U.S.S.R. It is  
8 the reinforcement of defenses vis-a-vis the Soviet  
9 Union -- defense and vigilance.

10 Q According to the decision taken by this  
11 Imperial conference of July 2, 1941, it was the Kwantung  
12 and Korean Armies which were intended to be used in case  
13 it would be necessary to use arms against the U.S.S.R.  
14 Is that so?

15 A If the situation arises which would require  
16 the exercise of armed forces, the Kwantung Army and  
17 the Korean Army would be used as a matter of course,  
18 but in the operation plans for 1941 it was also planned  
19 that reinforcements be sent from Japan proper as well  
20 as from China.

21 Q Was not it the purpose of Kan-tokuen in the  
22 shortest possible time to strengthen and prepare the  
23 Kwantung Army for a war against the U.S.S.R.?  
24

25 A The purpose of the Kan-tokuen was to reinforce  
and strengthen the defensive and vigilance system or

1 organization of the Kwantung Army because it had  
2 become extremely weak. The Kan-tokuen was not a war  
3 preparation vis-a-vis the Soviet Union. I might  
4 add that the Kan-tokuen was a plan for the reinforce-  
5 ment of troop strength to carry out the purposes to  
6 which I have already referred and is not an operation  
7 plan or a war plan. It does not include operational  
8 items.

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TANAKA, S.

CROSS

1 Q Mr. Witness, your answer not only contradicts  
2 the excerpt which I read from exhibit 779, but also  
3 your statements made in your affidavit.

4 THE PRESIDENT: We will decide those things,  
5 Colonel Ivanov. Do not carry on a conversation with  
6 the witness. Be satisfied to question him. You can  
7 comment later on his answers.

8 COLONEL IVANOV: Yes, sir.

9 Q Mr. Witness, will you tell me, was it the  
10 General Staff or the War Ministry which drafted the  
11 instructions sent in 1941 to commanding general of the  
12 Kwantung Army UMEZU? These instructions dealt with  
13 the measures necessary for strengthening the fighting  
14 power of the army for a war against the U.S.S.R. and  
15 you mention these instructions on page 9 of your affi-  
16 davit, paragraph 2.

17 A It is not very clear and I should like to have  
18 it explained, but I do not think that I have stated in  
19 my affidavit anything with reference to an offensive  
20 preparation against the Soviet Union -- to strengthen  
21 offensive preparations against the Soviet Union.

22 Q We shall return to this question.

23 Now, will you tell me, was the mobilization  
24 of reserves carried out in Japan and Manchuria in the  
25 summer of 1941, starting with July, that is several



TANAKA, S.

CROSS

days later after Germany had attack the Soviet Union?

A In the effectuation of the Kan-tokuen it is a fact that the first replacement reserves and the second replacement reserves were called up.

Q Why do you in your affidavit call this mobilization "extraordinary mobilization"? Was it a secret mobilization?

A I do not state that it is an emergency mobilization or an extraordinary mobilization in my affidavit.

Q Was it carried out in secrecy or not?

A No, that should not be called mobilization. It is a temporary muster order or temporary calling up order. Shall I explain to you why the word "mobilization" was not used?

Q That could have been for the purpose of comeuflaging these matters. It is quite clear for a military man -- to a military man -- and it needs no explanation.

A In the Japanese Army at that time the word "mobilization" was used when the organization of the army is changed from a peacetime footing to a wartime footing. But in the Kan-tokuen the Army was not placed on a war footing. Therefore, it was not a mobilization.

TANAKA, S.

CROSS

1           Q   Is it possible to explain the coincidence of  
2 such measures as the mobilization of the reservists  
3 or calling up of the reservists for a replenishment of  
4 the Kwantung Army units at the time when the Soviet-  
5 German war started?

6           A   May I have the question repeated in Japanese?  
7 It was not clear to me.

8                   (Whereupon, the question was read  
9 by the Japanese court reporter.)

10          A   Yes, the time was about the same.  
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1 Q I shall read to you an excerpt from exhibit 830.  
2 This is a secret telegram sent on July 25, 1941, from  
3 Tokyo to Berlin by Kretschmar.

4 I quote ~~page 1~~, paragraphs 1 and 2:

5 "Simultaneously for the Supreme Headquarters  
6 of the Wehrmacht and Supreme Army Headquarters.

7 "1) The draft of reserves slowly beginning in  
8 Japan and Manchukuo on 10 July and the following days,  
9 suddenly reached a large and no longer concealable  
10 extent, especially in the 1st, 4th, 7th, 12th and 16th  
11 division, and continued until today in decreased  
12 strength. Until the middle of August supposedly about  
13 900,000 reservists are to be drafted, that is the 24  
14 to 45-year olds; among the eldest, however, only  
15 specialists like drivers, technicians, people able to  
16 speak Russian, etc. After that, another 500,000  
17 reservists, are supposedly available.

18 "2) Together with the drafting of the reser-  
19 vists on 10 July /orders came for/ a draft of horses,  
20 motor vehicles, etc., and a little later, instructions  
21 to firms to provide military goods of consumption, like  
22 foodstuffs, candles, and others till the end of Septem-  
23 ber at the latest."

24 Were all these measures effectuated?

25 A I state very positively at this time that that

TANAKA, S.

CROSS

1 telegram is not based upon facts. And I am impressed  
2 by the manner in which that telegram has been written,  
3 as it gives the impression that Japan was about to  
4 accord with and to join in the German-Soviet War. That  
5 is not so.

6 Now, if I am to indicate the facts, the mobi-  
7 lization of 900,000, or the mobilization of 500,000,  
8 these are not based upon facts at all.

9 It also states to the effect that Japanese  
10 males from the age of 28 to 42 or somewhere around there  
11 throughout the nation of the entire nation was mobi-  
12 lized, or something to that effect; but this is a com-  
13 plete distortion. But it is a fact that call-ups were  
14 effected within the scope and requirements of the  
15 Kan-tokuen.

16 Q I will quote one more excerpt from exhibit 830.  
17 I quote paragraphs 5 and 6:

18 "5) Since about 10 July transporting of  
19 troops, beginning with quartermaster troops, technician  
20 troops and artillery of the 16th and 1st division and  
21 transport of reservists from Japan. Goal: Seishin and  
22 Rashin for troops and reservists, Tientsin and Shanghai  
23 only for reservists.

24 "6) Since the middle of July preparation in  
25 Manchuria for billeting and the arrival of troop

TANAKA, S.

CROSS

1 transports. In addition increased transport of military  
2 goods, which may be interpreted as the establishing of  
3 supply bases."

4 Do not these paragraphs of the document make  
5 any changes in your statements or in your answers?

6 A Such facts may have existed, but I cannot but  
7 be impressed by the over-exaggeration of the facts.

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TANAKA, S.

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1           Q Mr. Witness, do not you in paragraph 4 of the  
2 sixth part of your affidavit, end of page 9 and beginning  
3 of page 10 of the English text, name the similar measures  
4 of the Kan-tokuen for the preparation of Japan for a  
5 war against the U.S.S.R.?

6           I will read an excerpt from your affidavit.  
7 I quote: "The main features of the so-called Kwantung  
8 Army Special Maneuver included reinforcement of the  
9 divisions stationed in Manchuria, dispatch of two  
10 divisions (one of which was diverted to South China  
11 in September), additional dispatch of forces under the  
12 direct control of the Kwantung Army such as air forces  
13 and artillery, additional dispatch of supply forces  
14 such as automobile and transport units, organization  
15 of the Kwantung Defense Headquarters to command all  
16 independent garrisons existing in Manchuria, establish-  
17 ment of the 20th Army Corps Headquarters, and increased  
18 supply of munitions. Also such matters required from  
19 the above items as mobilization of men, collection of  
20 materials, organization and equipment of the forces,  
21 transportation of men and materials, training, disposi-  
22 tion and billeting of the forces were dealt with. For  
23 the mobilization of the required men the form of emer-  
24 gency enlistment was adopted and each unit was placed  
25 on the basis of full equipment, but not on the wartime



1 basis."

2 Didn't you state that in your affidavit?

3 A Section 6 of my affidavit is devoted to the  
4 Kan-tokuen. I have written about it and, naturally,  
5 it was written as read. But I also recognize that  
6 there is a great divergence between the telegram you  
7 referred to sent from Tokyo to Berlin and what I have  
8 stated in my affidavit.

9 Q When comparing these two documents we don't  
10 see great difference between the two. Do not all  
11 measures of the Kan-tokuen named in your affidavit  
12 and in Kretschmar's telegram coincide?

13 A Yes, there are differences. Let me state them:  
14 First of all the telegram sent to Germany, from what  
15 I presume was the German military attache, was written  
16 on the premise that the Kan-tokuen was a preparation  
17 for war against the Soviet Union, whereas the real  
18 purpose of the Kan-tokuen in Japan was passive and  
19 negative in nature, and that it was for the purpose of  
20 reinforcing the defense and vigilance of our troops.  
21 On this point there is a very great difference.

22 Q You are speaking about other question which  
23 was not asked of you. I ask you to state briefly  
24 whether there is coincidence or differences between  
25 your affidavit and the document which I read; whether

1 there is more coincidences than differences, that is  
2 between your affidavit and telegram sent by Kretschmar.  
3 Answer briefly.

4 A There are very important, vital differences.  
5 For instance, there is a very great difference in  
6 the number of troops to be sent to Manchuria.

7 COLONEL IVANOV: I ask the honorable Tribunal  
8 to decide about the coincidence and differences between  
9 these two documents.

10 THE PRESIDENT: We will recess for fifteen  
11 minutes.

12 (Whereupon, at 1045, a recess was  
13 taken until 1100, after which the proceedings  
14 were resumed as follows:)  
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1 MARSHAL OF THE COURT: The International  
2 Military Tribunal for the Far East is now resumed.

3 THE PRESIDENT: Colonel Ivanov.

4 BY COLONEL IVANOV (Continued):

5 Q Mr. Witness, before the recess I told you  
6 that we shall return to one of the questions. Now,  
7 I return to this question. I will read to you an  
8 excerpt from your affidavit, paragraph 2 on page 9  
9 of the English text. You probably simply forgot the  
10 contents of that part of your affidavit, and, there-  
11 fore, you could not answer my question. I will re-  
12 mind you of its contents. I quote:

13 "Then, in July of 1941, on the occasion of  
14 the so-called Kwantung Army Special Maneuver, the  
15 Imperial Headquarters gave an instruction to the  
16 commander of the Kwantung Army to the effect that  
17 the purpose of reinforcement, the so-called Kwan-  
18 tung Army Special Maneuver, was to strengthen pre-  
19 paredness against the USSR."  
20

21 Then, if these instructions, as you state,  
22 were sent to the commander of the Kwantung Army,  
23 General UMEZU, by the Imperial Headquarters, then  
24 in the drafting of that instruction, TOJO and the  
25 chief of the General Staff took part, didn't they?

A The order was issued by the Imperial Head-

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CROSS

1 quarters, but the order itself was drafted by the  
2 chief of staff of the Army who, upon drafting it,  
3 consulted with the War Minister -- it is a fact that  
4 following the drafting of the order the chief of the  
5 General Staff consulted the Minister of War. However,  
6 upon hearing that passage read to me, I cannot say  
7 and I would not say that this is in contradiction to  
8 what I have stated so far.

9 Q You even could not remember the instructions  
10 itself and its contents.

11 I pass to the next question. Mr. Witness,  
12 will you tell me, did not the 1st Division of the  
13 General Staff under your general supervision draft  
14 the operation plans of war against the USSR in 1941  
15 and 1942?

16 A I think the use of the words "war operation-  
17 al plans" would invite misunderstanding. However, it  
18 is a fact that in the General Staff office annual  
19 plans with regard to possible war against the Soviet  
20 Union were drawn up.

21 Q Why, then, you, in your affidavit, enlarging  
22 upon the situation and the operational plan of the  
23 General Staff for 1941, do not mention what Soviet  
24 cities it was planned to seize by the Japanese troops  
25 on the first stage of war and what cities it was

1 planned to seize on the second stage of the war?

2 Maybe you will remember now.

3 A Is that with respect to the plan for 1941?

4 Q Yes, in respect to the plan which was drafted  
5 at the beginning of the year.

6 A I have stated somewhat at length the reasons  
7 for the operational plans which were drawn up at the  
8 beginning of 1941. I have stated and explained the  
9 bases upon which the operational plans for that year  
10 was drawn up, because I felt that by understanding  
11 the fundamental bases upon which the plans were drawn  
12 up would convey a better understanding of Japan and  
13 the situation she was then in.

14 Q In your affidavit, you avoided stating the  
15 contents of the operational plans in their substance.  
16 The most important thing is not the preliminary re-  
17 marks to the plan but its contents. Will you tell  
18 me what Soviet cities did the Japanese troops plan  
19 to seize during the campaign of 1941 -- as provided  
20 by the plan of 1941? Answer briefly and exactly to  
21 the question.

22 A Before replying, I should like to state a  
23 few words. It appears from the question just asked  
24 that Japan was planning an aggressive war. That is  
25 not so. What I wish to reply to is this: it is the

1 planned to seize on the second stage of the war?

2 Maybe you will remember now.

3 A Is that with respect to the plan for 1941?

4 Q Yes, in respect to the plan which was drafted  
5 at the beginning of the year.

6 A I have stated somewhat at length the reasons  
7 for the operational plans which were drawn up at the  
8 beginning of 1941. I have stated and explained the  
9 bases upon which the operational plans for that year  
10 was drawn up, because I felt that by understanding  
11 the fundamental bases upon which the plans were drawn  
12 up would convey a better understanding of Japan and  
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15 contents of the operational plans in their substance.  
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17 marks to the plan but its contents. Will you tell  
18 me what Soviet cities did the Japanese troops plan  
19 to seize during the campaign of 1941 -- as provided  
20 by the plan of 1941? Answer briefly and exactly to  
21 the question.

22 A Before replying, I should like to state a  
23 few words. It appears from the question just asked  
24 that Japan was planning an aggressive war. That is  
25 not so. What I wish to reply to is this: it is the

TANAKA, S.

CROSS

1 operational plans after war breaks out. May I go on?

2 Q You answer this simple question, please.

3 Did the plan of 1941 provide for the seizure of any  
4 Soviet cities or not? Answer yes or no.

5 A Then, I shall answer yes or no. The Japa-  
6 nese Army would, after the operational plan takes  
7 effect -- was to strike an offensive eastward and to  
8 destroy the bases for long range bombing.

9 Q I will read to you an excerpt from exhibit  
10 No. 834 concerning the plan of war against the USSR.  
11 This plan was drawn up by the Japanese General Staff  
12 for 1941. This testimony was given by Lieutenant  
13 Colonel SEJIMA, Ruizo, former officer of the 1st  
14 Division of the General Staff. I quote:

15 "According to the operational plan for the  
16 year 1941 (Showa 16) the Kwantung Army was to concen-  
17 trate its main forces in the direction of the Mari-  
18 time Provinces, a part of its forces in the direction  
19 of Blagoveshchensk and Kuivshevsk, and another part  
20 in the neighborhood of Hailar while the reserve was  
21 to be concentrated in Harbin in the event of a Russo-  
22 Japanese war. The offensive was to be taken from the  
23 Sui-Ren Ho district towards and from the Hei-Ho dis-  
24 trict towards the Blagoveshchensk and Kuivshevsk  
25 districts. Plans were made for the forces in the



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1 neighborhood of Hailar to take a defensive position  
2 in order to protect offensive operations in other  
3 areas. The aim of the offensive operations in the  
4 Maritime Provinces was to occupy that area, while  
5 the offensive in the Blagoveshchensk and Kuivshevsk  
6 districts was meant to cut the railway, to make re-  
7 inforcement and supply from the west possible.

8 "In the first phase of the war, they ex-  
9 pected to occupy Voroshilov, Vladivostok, Blagovesh-  
10 chensk, Iman, Kuibyshevka and Rukhlovo, while in the  
11 second phase, they expected as far as the situation  
12 permitted, to occupy North Sakhalin, Port Petropav-  
13 lovsk of Kamchatka, Nikolayevsk of the Amur River,  
14 Komsomolsk and Sorgavan."

15 Mr. Witness, do you in your affidavit mean  
16 as protracted defense at the beginning of the war  
17 precisely this plan of seizure of Soviet territories  
18 on the first and second stage of the war?

19 A That is not so. With the commencement of  
20 operations, the Japanese Army would take a position  
21 for a long -- that is, protracted defensive oper-  
22 ations in the frontier districts of Manchuria and  
23 Soviet Russia. That is what I am referring to.

24 Q Do you know, Mr. Witness, that the General  
25 Staff of Japan issued instructions to the headquarters

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1 neighborhood of Hailar to take a defensive position  
2 in order to protect offensive operations in other  
3 areas. The aim of the offensive operations in the  
4 Maritime Provinces was to occupy that area, while  
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6 districts was meant to cut the railway, to make re-  
7 inforcement and supply from the west possible.

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9 pected to occupy Voroshilov, Vladivostok, Blagovesh-  
10 chensk, Iman, Kuibyshevka and Rukhlovo, while in the  
11 second phase, they expected as far as the situation  
12 permitted, to occupy North Sakhalin, Port Petropav-  
13 lovsk of Kamchatka, Nikolayevsk of the Amur River,  
14 Komsomolsk and Sorgavan."

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20 operations, the Japanese Army would take a position  
21 for a long -- that is, protracted defensive oper-  
22 ations in the frontier districts of Manchuria and  
23 Soviet Russia. That is what I am referring to.

24 Q Do you know, Mr. Witness, that the General  
25 Staff of Japan issued instructions to the headquarters

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1 of the Kwantung Army providing for the drafting of  
2 the operational plan of war against the USSR in 1942?

3 A With regard to the operational plan for the  
4 fiscal year of 1942, it is my recollection that the  
5 outline was drawn up by the General Staff office of  
6 the Army, and the Kwantung Army was directed to act  
7 in accordance with this outline and prepare the de-  
8 tails of the plan.

9 Q Do you know Major General MATSUMURA, Tomo-  
10 katsu, former chief of the Russian Sector of the 2nd  
11 Section of the 2nd Division of the General Staff  
12 and later Vice-Chief of the Headquarters of the  
13 Kwantung Army?

14 A I know him.

15 Q I will read an excerpt from exhibit 836,  
16 the affidavit of Major General MATSUMURA Tomokatsu.  
17 I quote:

18 "1) Having arrived at the Headquarters of  
19 the Kwantung Army in the 18th year of Showa (1943),  
20 I, as the Chief of the Strategy Section, was first  
21 of all informed of the operations plan kept by the  
22 Headquarters. At this time I was informed of the  
23 directives of the Army General Staff concerning the  
24 operations plan against Soviet Russia for the 17th  
25 year of Showa (1942) and the operations plan itself



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1 of the Kwantung Army Headquarters based upon the  
2 said directives.

3 "The directives of the Army General Staff  
4 instructed the Kwantung Army Headquarters to form an  
5 operations plan against Soviet Russia with the occu-  
6 pation of the Maritime Provinces of Soviet Russia and  
7 the destruction of the air-bases in the Maritime  
8 Province as the general objectives, and also to  
9 focus the principal attack upon Voroshilov. It was  
10 also written in the directives that the Kwantung  
11 Army should make preparations for further operations  
12 after occupation of the Maritime Provinces."

13 Mr. Witness, will you tell me, do you call  
14 these operations for seizure of the Maritime Provinces  
15 passive offensive? Don't you understand, under the  
16 term of active offensive, the seizure of the Siberia  
17 and the Urals?

18 A Whether the offensive is a negative one or  
19 a passive one, that would be merely the form of  
20 strategy. But, you say that the occupation of the  
21 Maritime Province is negative and the occupation of  
22 the Urals and other areas were negative. That has  
23 no connection whatsoever with the matter. At the  
24 outset of the operations, the Japanese Army was to  
25 take a stand for a protracted defense. Meanwhile,

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1 following the completion of operational preparations,  
2 different, new action would be taken. This was called  
3 a passive offensive, and that was the operations that  
4 was to be taken by the Kwantung Army.

5 Q Mr. Witness, tell me, was not it planned  
6 to include the Soviet Far East into the so-called  
7 Greater East Asia Sphere? Do you know anything about  
8 it?

9 A The question of the Greater East Asia Co-  
10 Prosperity Sphere is a political question with which  
11 the General Staff has no connection whatsoever. How-  
12 ever --

13 Q I will read to you an excerpt from exhibit  
14 675A. This is an article of the accused, HASHIMOTO,  
15 Kingoro, published on January 5, 1942. I quote:

16 "Then I should like to think that the  
17 Greater East Asia Sphere includes the undermentioned  
18 countries."

19 I omit several lines and continue to quote  
20 further:

21 "Japan, Manchukuo, China, the Soviet Far  
22 East, French Indo-China, Burma, Malay, the Dutch  
23 East Indies, India, Afghanistan, Australia, New Zea-  
24 land, Hawaii, Philippines, and the islands of the  
25 Pacific Ocean and the Indian Ocean.

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1            "We cannot yet decide whether all these  
2 countries should be incorporated at once in the  
3 Sphere under Imperial Influence, but it is at  
4 least absolutely necessary to include for the sake  
5 of national defense these countries in the sphere  
6 of our influence."

7            Didn't the operation plans of the General  
8 Staff for 1941-42 reflect in some measure these,  
9 although political but still aggressive, intentions  
10 of the ruling circles of Japan -- intentions which  
11 were expressed by HASHIMOTO, Kingoro?

12           A    Such opinions or views are not reflected  
13 in the operations plans drawn up by the General Staff.  
14 HASHIMOTO, Kingoro, as far as I know, is just one of  
15 the common people, a civilian, and at that time had  
16 no position of leadership or influence in matters of  
17 this kind.  
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Q But still I think that you shall not deny that the operation plans directed against the Soviet Union, Burma, Netherlands, Australia, Netherlands Indies and other peaceful countries were drafted by the General Staff, by the First Division of the General Staff?

A We were formulating operations plans for defensive purposes.

THE PRESIDENT: What do you mean by that; defensive against Australia, for instance?

THE WITNESS: Operations plans as regards Australia never existed.

THE PRESIDENT: It is the first time you have said it.

THE WITNESS: There are none -- or there were none.

MR. BLAKENEY: I would like to point out, if the Tribunal please, that the only suggestion of operations plans against those countries came from the prosecutor. The witness never discussed it before then.

THE PRESIDENT: The position is not so plain. He was asked a question which included Australia and he was satisfied to say that plans were defensive. He has now said Australia was not included, which is

1 another matter.

2 Q Will you answer my questions yes or no and  
3 in no other way, please?

4 Did the First Division of the General Staff  
5 draft any operation plans against the Philippines, yes  
6 or no?

7 A When?

8 Q In 1941?

9 A Yes, Philippines was included in the annual  
10 plan drawn up for the fiscal year 1941.

11 Q Was there any plan against Netherlands  
12 Indies at the same time, yes or no?

13 A No.

14 Q Was there any such plan directed against  
15 Java and Burma, yes or no?

16 A No.

17 Q Was there any plan, any such plan, against  
18 Malaya?

19 A The idea of operations existed.

20 COLONEL IVANOV: Your Honor, in rebuttal  
21 the prosecution will produce interrogations of TANAKA,  
22 Shinichi -- interrogations conducted by the prosecution.

23 THE PRESIDENT: Is that the man who gave  
24 evidence?

25 COLONEL IVANOV: Yes, the same person gave

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1 evidence during those interrogations but unfortunately  
2 we cannot use them now because they are not ready for  
3 being used in the courtroom now.

4 THE PRESIDENT: Put to him the evidence  
5 TANAKA gave here but do not go beyond that to inter-  
6 rogations that preceded the evidence. I am thinking  
7 of the other TANAKA.

8 MR. BLAKENEY: Mr. President, he is  
9 referring to the witness now on the stand and we  
10 would like to call upon the prosecution, if they  
11 have the intention of confronting the witness -- of  
12 producing interrogations of this witness -- to confront  
13 him with them now rather than at some other time.

14 COLONEL IVANOV: I have already explained  
15 to the Honorable Tribunal that they cannot produce  
16 these documents now because they are not processed.  
17 The prosecution has the right to produce them in  
18 rebuttal.

19 MR. BLAKENEY: Under the rules prevailing  
20 in this Tribunal they have the duty to confront the  
21 witness with any matter which they propose to use  
22 as impeachment of his testimony. Processed or not,  
23 the evidence could be put to the witness now.

24 COLONEL IVANOV: I don't know any such  
25 rules in the practice of the Tribunal and I think such



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1 rules never existed before. I stated simply that  
2 this witness was interrogated by the prosecution and  
3 that certain documents will be produced during rebuttal,  
4 and I meant nothing more.

5 THE PRESIDENT: There is no rule which  
6 prevents you from following that course, Colonel  
7 Ivanov, but if you don't give the witness an oppor-  
8 tunity of answering these interrogations while he  
9 is here you weaken the effect of his answers to the  
10 interrogations. Your rebuttal evidence will not be  
11 strong, or so strong as it might be.

12 COLONEL IVANOV: Your Honor, I would gladly  
13 follow your advice. Unfortunately, the documents are  
14 not processed and they are not prepared to be produced.  
15 I have at my disposal no English and Japanese version  
16 of the text now.

17 THE PRESIDENT: Colonel Ivanov, if these  
18 interrogations go merely to credibility you cannot  
19 use them in rebuttal unless you put them to the witness  
20 now.

21 COLONEL IVANOV: I pass on to the next  
22 question.

23 Q Mr. Witness, in your affidavit you call the  
24 operational plans of a war against the USSR "defensive"  
25 plans. Did not the Japanese General Staff during the

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1 last two decades draft plans of attacking the Soviet  
2 Union and seizure of the Soviet territories?

3 A I don't know all about the twenty years  
4 of the General Staff Office. I went to the General  
5 Staff for the first time in 1940. At that time when  
6 I perused the documents in the General Staff Office  
7 I found no evidence whatsoever of any plans for an  
8 offensive against the Soviet Union during the past  
9 twenty years, and I discovered to what extent the  
10 General Staff had racked his brains and made every  
11 effort possible to defend -- for defensive purposes  
12 while being somewhat apprehensive of Japan's situation  
13 in the face of Soviet strength.

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T. NAKA, S.

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1           Q   I shall read to you the following state-  
2           ment of Japanese Ambassador OSHIMA made by him on  
3           the 18th of April, 1943, to Ribbentrop. I quote  
4           from exhibit 839-A, page 1:

5                     "Ambassador OSHIMA explained that he did  
6           not know the views of his Government but understood  
7           that for the last 20 years all plans of the General  
8           Staff had been worked out for an attack on Russia  
9           and were still directed towards such an attack.  
10          If success in that direction could in any way be  
11          expected, they would certainly attack."

12                    THE PRESIDENT: I should state now, Colonel  
13          Ivanov, for the general information that some Members  
14          of the Tribunal are apprehensive at the number of  
15          references made by you, more particularly, to the  
16          giving of evidence in rebuttal. I cannot say that  
17          there is complete unanimity on this point among all  
18          Members of the Bench. However, you will have to  
19          consider seriously whether evidence you propose to  
20          tender in rebuttal may not be rejected. I cannot  
21          say just how the Members will vote on any such issue,  
22          but it is a consideration for you, Colonel Ivanov,  
23          not to assume too much about tendering evidence in  
24          rebuttal. I cannot say whether the Members of the  
25          Tribunal will adhere to the technical rules, and if

1 they decide to adhere whether they will agree upon  
2 what they are. They may differ in different coun-  
3 tries, and they do.

4 COLONEL IVANOV: Your Honor, I will take  
5 into consideration all that you have said, but now  
6 the question is only of one interrogation. The  
7 present examination is concerned only with one  
8 document.

9 Q Mr. Witness, can you tell me what units  
10 were transferred from the Kwantung Army late in  
11 autumn, 1941, to the Southern Regions?

12 A I have deposed with respect to the units  
13 which were sent between September and November,  
14 1941, that is transferred. The troops transferred  
15 included the following:

16 One division, three tank regiments, three  
17 heavy artillery regiments -- that is, five artillery  
18 regiments -- 24 anti-aircraft companies, three  
19 headquarters of the air corps, four fighter squadrons,  
20 three light bomber squadrons, two heavy bomber  
21 squadrons, five companies of reconnaissance, and also,  
22 in addition, ground crews, that is ground airforce.  
23 These were the principal troops which were trans-  
24 ferred, but there were also others.

25 Q What sort of airforce units were in the

1 Far East at the beginning of 1942, according to  
2 your estimation? Do you recall the number of units  
3 and types of the planes? Will you state the number  
4 of units and the types of the planes?

5 A What I have stated in my affidavit is not  
6 my estimate. That is the intelligence in the  
7 possession of the Second Division of the General  
8 Staff Office, and the estimate made by the General  
9 Staff with regard to Soviet air strength in the  
10 Far East was 1200 planes. Broken down, they in-  
11 cluded 60 heavy bombers, 80 long-distance bombers,  
12 330 light bombers, 450 fighter planes, 60 assault  
13 planes, 200 sea planes. That is roughly the  
14 figures of the various types of planes, and they  
15 total 1200 approximately.

16 Q Mr. Witness, do you have sufficient trust-  
17 worthy documentary data concerning the units of the  
18 Soviet Army in the Far East in the period 1940-42?

19 A At present I do not have any documents.

20 Q All numerical data concerning Soviet troops  
21 in the Far East given in your affidavit, you gave  
22 from memory, is that so?

23 A Those figures come from my very reliable,  
24 accurate memory. Following the war's end, I had  
25 a number of conversations and talks with my

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1 subordinates on these very matters and confirmed  
2 my memory; that is, my former subordinates.

3 Q I am not interested in that now. Mr. Witness,  
4 will you tell me, you, being Chief of the First  
5 Division of the Japanese General Staff, were re-  
6 sponsible for drafting of operational plans of a  
7 war against the Soviet Union and the United States,  
8 Great Britain, and China in the period from 1940-  
9 1942, were not you? Answer briefly "yes" or "no."

10 A No, the responsibility rests with the  
11 Chief of the Army General Staff.

12 Q Had you admitted the operational plans  
13 which were drawn up by the General Staff of Japan in  
14 1941-42 under your supervision, plans directed  
15 against the U. S. S. R., United States, Great  
16 Britain, and China, were aggressive, had you  
17 admitted that then, you would have been responsible  
18 for these plans as an alleged war criminal, wouldn't  
19 you?

20 THE PRESIDENT: That is argumentative.

21 COLONEL IVANOV: That is all, your Honor.

22 THE PRESIDENT: We will adjourn until half-  
23 past one.

24  
25 (Whereupon, at 1200, a recess was  
taken.)



TANAKA, S.

## AFTERNOON SESSION

The Tribunal met, pursuant to recess,  
at 1330.

MARSHAL OF THE COURT: The International  
Military Tribunal for the Far East is now resumed.

THE PRESIDENT: Major Blakeney.

MR. BLAKENEY: There is no re-examination.  
May the witness be released on the usual terms?

THE PRESIDENT: He is excused on the usual  
terms.

(Whereupon, the witness was excused.)

THE PRESIDENT: Major Blakeney.

MR. BLAKENEY: Returning again to the  
affidavit of Lieutenant-General TOMINAGA, prosecution  
exhibit 705, I read another short excerpt. In the  
part read by the prosecution General TOMINAGA  
stated that in 1940 he drew an aggression plan  
against USSR. As showing that this so-called aggression  
plan was nothing more than an operations plan, I  
read his further explanation from page 5 of the  
affidavit, commencing with the fifth question.

"Q When was the time of aggression against  
U.S.S.R. by the plan?

"A In this plan the time of opening War

1 was not indicated, because it should be decided by  
2 the Emperor, after discussion in the Supreme Council.

3 "Q Where was the plan preserved after the  
4 Imperial sanction?

5 "A It was preserved in Operation Section  
6 of 1st Department of General Staff Headquarters.

7 "Q To whom was the copy of the plan sent?

8 "A The copy of the plan was sent to the  
9 Kwantung Army.

10 "Q What kinds of measures were taken to  
11 carry this plan into practice?

12 "A A senior officer (whose name I forgot)  
13 went with this plan and handed it over to the  
14 Commander-in-Chief of the Kwantung Army to put it  
15 into practice."

16 I omit the next question and answer already  
17 read and read the next.

18 "Q When was it sent to the Kwantung  
19 Army to put into practice?

20 "A At the beginning of April of 1940."

21 I now call as a witness HANAWA, Gikei,  
22 who will testify by his affidavit, defense document  
23 No. 1146.  
24

25 - - -

HANAWA

DIRECT

1 Y O S H I Y U K I H A N A W A, called as a  
2 witness on behalf of the defense, being  
3 first duly sworn, testified through  
4 Japanese interpreters as follows:

## DIRECT EXAMINATION

5  
6 BY MR. BLAKENEY:

7 Q Will you state, Mr. Witness, your name and  
8 residence, please.

9 A My name is HANAWA, Yoshiyuki; my address  
10 No. 12, 4-Chome Tatekawa, Sumida-ku, Tokyo.

11 MR. BLAKENEY: I ask that the witness be  
12 handed defense document No. 1146.

13 (Whereupon, the document above  
14 referred to was handed to the witness.)

15 Q I ask you, Mr. Witness, to examine that and  
16 state whether it is your affidavit, signed and  
17 sealed by you?

18 A This is my affidavit.

19 Q Are the contents thereof true and correct?

20 A Yes.

21 MR. BLAKENEY: The affidavit, defense document  
22 No. 1146 is offered in evidence.

23 THE PRESIDENT: Admitted on the usual terms.

24 CLERK OF THE COURT: Defense document  
25 No. 1146 will receive exhibit No. 2678.

HANAWA

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1 (Whereupon, the document above  
2 referred to was marked defense exhibit  
3 No. 2678 and received in evidence.)

4 MR. BLAKENEY: I shall read the affidavit,  
5 omitting formal parts.

6 "During the four years from the time I  
7 arrived at Hsinking as counsellor of the Japanese  
8 Embassy in Manchoukuo, on 12 November 1940, until  
9 the time when General UMEZU, appointed Chief of the  
10 General Staff, left for Tokyo at the end of August  
11 1944, I worked under him. I believe that I am  
12 one of those who best know his character and his  
13 political ideas.

14 "Ambassador UMEZU's first principle was  
15 maintenance of peace and order in Manchoukuo; he  
16 adopted the policy of having no trouble with the  
17 Soviet for the sake of the healthy progress of  
18 Manchoukuo; he instructed the Chief of General  
19 Affairs Board TAKEBE, Vice-Minister of Foreign  
20 Affairs SHIMOMURA, and myself who was in charge  
21 of the Japanese Diplomatic Mission. This principle  
22 of his was strengthened after the outbreak of the  
23 Pacific War. The fact that he decided all questions  
24 according to this principle is clearly demonstrated  
25 by the following examples:

HANAWA

DIRECT

1            "In the middle of December 1942, as  
2 Japanese Ambassador and Commander-in-Chief of the  
3 Kwantung Army, UMEZU went to Tokyo to report on  
4 Manchoukuo's general condition and at this occasion  
5 he reported to the Emperor that he was devoting his  
6 utmost efforts to keeping peace with the Soviet.  
7 After he came back to Hsinking he told me that his  
8 report satisfied the Emperor, as His Majesty was  
9 also worried about Soviet relations, and that the  
10 Emperor instructed him to see that all instructions  
11 regarding this matter reach thoroughly to his  
12 subordinates.

13            "Immediately after I arrived at Hsinking  
14 at the end of 1940, I heard the report that ISOMURA,  
15 who was in charge of information (Kwantung Army)  
16 told a member of the Embassy staff that UMEZU, in  
17 settling the Nomonhan Incident, strictly instructed  
18 his men that any border incident be settled by  
19 consultation with Tokyo. Following the outbreak  
20 of the Pacific War, his ideal, as he became more  
21 careful, found expression in many ways in Manchoukuoan  
22 politics; for example, in 1943 a Public Administration  
23 Order was issued to frontier officials to the effect  
24 that when floating timber on border rivers reached  
25 Manchoukuo territory, it should not be dealt with

1 directly but instructions from the central government  
2 in Hsinking must be waited.

3 "In Dairen, in 1943, he invited the Dairen  
4 police chief to visit him and advised him to be  
5 careful as to activities against personnel of the  
6 Soviet Consulate by way of prevention of espionage,  
7 due to the complicated international relations and  
8 such people's status as foreign diplomats. As a  
9 result, if I remember correctly there was no trouble  
10 concerning relations with the Soviet in Dairen.

11 "Shortly after his visit to Dairen, he visited  
12 Harbin and gave the same advice to the Chief of the  
13 Special Services Section, Major General DOI. In  
14 Harbin there were minor troubles -- what might be  
15 considered as the revenge for Soviet pressure on  
16 Japanese Consulate personnel in Chita and Blagovesh-  
17 chensk. It was, however, all settled by Manchoukuo's  
18 compliance.

19 "About July 1942, when the German Minister  
20 Wagner visited him to sound the intention of the  
21 Kwantung Army concerning Japan's joining the Russo-  
22 German War, he expressed his opinion that it would  
23 be most advantageous for Japan to concentrate on  
24 the Greater East Asia War even though the question  
25 of Japan's joining the Russo-German War was a matter



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1 for Tokyo to decide, and thus he gave him indirectly  
2 the impression that he was against it."

3 You may cross-examine.

4 COLONEL IVANOV: Your Honor, I refer the  
5 Members of the Tribunal to six exhibits. Their  
6 numbers are 670, 723, 731, 736, 737, 738, 740.

7 The prosecution do not desire to cross-  
8 examine.

9 THE PRESIDENT: Major Blakeney.

10 MR. BLAKENEY: May the witness be released  
11 on the usual terms?

12 THE PRESIDENT: He is released accordingly.

13 (Whereupon, the witness was excused.)

14 MR. BLAKENEY: My next witness is IIMURA,  
15 Minoru, whose affidavit is defense document 1150.

16 I must call the Tribunal's attention to  
17 the fact that there is another affidavit by the  
18 witness IIMURA, which through inadvertence has not  
19 yet been served and therefore cannot be offered at  
20 this time, but I should like permission to recall  
21 him after the requirements of service have been  
22 complied with for the presentation of that additional  
23 evidence.  
24  
25

IIMURA

DIRECT

1 J O I I M U R A, called as a witness on behalf  
2 of the defense, being first duly sworn, testi-  
3 fied through Japanese interpreters as follows:

## DIRECT EXAMINATION

BY MR. BLAKENEY:

4  
5 Q Mr. Witness, please state your name and  
6 residence.

7  
8 A IIMURA, Jo, No. 201 2-chome Soshigaya,  
9 Setagaya-ku, Tokyo.

10 MR. BLAKENEY: I ask that the witness be  
11 handed defense document 1,150.

12 (Whereupon, a document was handed  
13 to the witness.)

14 Q I ask you, Mr. Witness, to examine that  
15 document and state whether it is your affidavit,  
16 signed and sealed by you.

17 A This document has my signature and seal.

18 Q Are the contents of the document true and  
19 correct?

20 A True and correct.

21 MR. BLAKENEY: I now offer in evidence  
22 the affidavit, defense document 1,150.

23 THE PRESIDENT: Admitted on the usual  
24 terms.

25 CLERK OF THE COURT: Defense document

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1 1150 will receive exhibit No. 2679.

2 (Thereupon, the document above  
3 referred to was marked defense exhibit 2679  
4 and received in evidence.)

5 MR. BLAKENEY: I shall read the affidavit  
6 with the exception of the third paragraph on page  
7 2, which I shall omit. I also omit the formal  
8 parts.

9 "I was appointed Chief of Staff of the  
10 Kwantung Army at the same time that General UMEZU  
11 was appointed Commander-in-Chief, on 7 September  
12 1939, and held that post until October 1940. In  
13 October 1941, I was appointed Commander of the 5th  
14 Army, which had its headquarters in Tongan on the  
15 Manchoukuo-Soviet border, and there served under  
16 the command of General UMEZU for two years, until  
17 October 1943.

18 "I. Our first duty as newly-appointed  
19 subordinates under General UMEZU in September 1939  
20 was to settle the Nomonhan Incident, according to  
21 Tokyo's instructions. Upon his appointment,  
22 General UMEZU gave us instructions, the main points  
23 of which were as below:

24 "(1) Study withdrawal of the border guard  
25 line and other matters in order to prevent border

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DIRECT

1 troubles in future.

2 "(2) All subordinates were to understand  
3 General UMEZU's intentions well and were not allowed  
4 to deviate from his intentions.

5 "(3) Subordinates were always to keep their  
6 commander-in-chief very well informed. When impor-  
7 tant matters were being investigated or planned the  
8 main points were to be reported to the commander-  
9 in chief first, and then investigation in detail  
10 should be made. Plans were, even while in progress,  
11 to be reported to the commander-in-chief, and were  
12 to be gradually completed according to his instruc-  
13 tions.

14 "During the full year when I served as  
15 chief of staff all subordinates were completely  
16 under General UMEZU's command concerning his above-  
17 mentioned policies. This complete control over  
18 his men by UMEZU was not only over them but also  
19 extended down to all troops under his command. I  
20 believe this complete command by Umezu over his men  
21 was based upon his firm determination not to cause  
22 border troubles like the Nomonhan Incident."

23  
24 Omitting the next paragraph:

25 "II. UMEZU's efforts in Preventing Border  
Troubles.

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1           "(1) The 'Border Guard Regulations of the  
2           Kwantung Army."

3           "The 'Border Guard Regulations' were made  
4           by the commander-in-chief and his subordinates  
5           together, being based on UMEZU's instructions given  
6           upon his appointment and running parallel to the  
7           settlement of the Nomonhan Incident, in order to  
8           avoid border troubles.

9           "I shall explain below concerning the  
10          'Border Guard Regulations' according to what I  
11          recall from my memory.

12          "a. Complete prevention of border troubles  
13          was to be the principle.

14          "b. A Border Guard Line was to be estab-  
15          lished behind the border, except in places where  
16          the border was very clear, and troop activities  
17          were prohibited beyond the Border Guard Line.

18          "c. The area between the Border Guard  
19          Line and the border was to be made a non-militarized  
20          zone. Only patrol parties made up of very small  
21          numbers of men might be dispatched to the non-mili-  
22          tarized zone, if any were required.

23          "d. A patrol party of course, and even  
24          troops stationed on or inside the Border Guard Line,  
25          were prohibited the use of arms except in case of

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1 absolute necessity for self-defense. (Transfer  
2 of troops in case of border trouble might not be  
3 done without operation orders from the commander-  
4 in-chief; this was particularly explained at the time  
5 the 'Border Guard Regulations' were ordered.)

6 "e. Even in case of illegal crossing of  
7 the border by Soviet planes, counter-attack by plane  
8 was strictly prohibited, though ground fire might  
9 be used.

10 "f. If an incident occurred on the bor-  
11 der it was to be reported immediately to higher  
12 headquarters (including Kwantung Army Headquarters).  
13 Such reports were to be given priority over every-  
14 thing else.

15 "As was mentioned above, the 'Border Guard  
16 Regulations' were made according to UMEZU's inten-  
17 tion, based upon current general conditions and  
18 Tokyo policy, to avoid any border troubles and keep  
19 peace in the north. Based on these 'Border Guard  
20 Regulations', every field commander made his 'border  
21 guard regulations' in detail. However, a field  
22 commander was not alone responsible for making  
23 these, but it was only permitted after close inves-  
24 tigation by UMEZU himself.  
25

"UMEZU also made strong representations



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1 to the Manchoukuoan side concerning prevention of  
2 border troubles, since vacant places along the bor-  
3 der -- not guarded by the Japanese army -- were  
4 guarded by the Manchoukuoan police.

5 "(2) Other Efforts of UMEZU to Avoid  
6 Border Troubles.

7 "It was UMEZU's firm determination from  
8 the time of his appointment to avoid border troubles  
9 in order to keep peace in the north. His determina-  
10 tion was further strengthened, I believe, when the  
11 Emperor gave him advice concerning peace in the  
12 north at the time he went to Tokyo in December 1939.

13 "The fact that there was not a border clash  
14 even once in his long term of five years in the  
15 Kwantung Army is clear evidence of this.

16 "The Emperor's advice was conveyed to us  
17 at the office of the commander-in-chief and also at  
18 the Army Commanders conferences, in December 1939.  
19 UMEZU used to have army commanders conferences  
20 once or twice a year. At every conference, includ-  
21 ing of course the first conference in October 1939  
22 he called his men's attention to prevention of bor-  
23 der troubles by saying: 'A fire must be stopped  
24 while it is small. If border trouble unfortunately  
25 happens -- though it should have been prevented

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1 beforehand -- it is desired that the army commander  
2 be on the spot to prevent expansion of the incident.  
3 I myself will go to the spot in order to settle it.'  
4 The state of affairs concerning prevention of bor-  
5 der trouble was always included in the reports of  
6 army commanders to the Army Commanders Conference.  
7 This situation was always true throughout my term  
8 as chief of staff, and also during my term as  
9 commander of the 5th Army under the command of  
10 UMEZU after October 1941.

11 "When I investigated the men's attitude  
12 toward prevention of border troubles immediately  
13 after reporting as commander of the 5th Army in  
14 October 1941, I recognized that the 'Border Guard  
15 Regulations' had been very well brought home to  
16 every man; and a term 'prevention of border trouble'  
17 was common among the men. All this was good evi-  
18 dence that UMEZU's wishes had been well drilled  
19 into all men under his command. In addition to  
20 giving instructions, UMEZU not only went himself,  
21 but also sent his staff officers to the front  
22 whenever there were chances for inspection to see  
23 how his order was being carried out. I also in-  
24 spected the eastern front many times.  
25

IIMURA

DIRECT

1 "Following the outbreak of the Pacific  
2 "war, UMEZU, realizing the necessity of keeping  
3 peace in the north, again issued written instruc-  
4 tions to avoid border troubles, as well as in-  
5 specting the whole front line himself for the pur-  
6 pose of preventing trouble. I received this order  
7 at Tonan H.O.

8 "That I want to state further is UMEZU's  
9 attitude toward reinforcement of the Kwantung Army  
10 while I was chief of staff. "We subordinates were  
11 very much worried about the defence of Manchoukuo,  
12 as the troops had sustained losses and the real  
13 power of the Soviet had become clear, as it was  
14 right after the Nomonhan Incident, and we used to  
15 feel uneasiness just after the ice melted on the  
16 frontier rivers. Though we subordinates wanted  
17 reinforcement, UMEZU would not permit our proposed  
18 reinforcement, saying, "We are in the middle of the  
19 China Incident and its settlement is most needed.  
20 At this time we should not ask Tokyo for reinforce-  
21 ment of the Kwantung Army; the shortage of manpower  
22 can be made up for by preventing border troubles  
23 and by strengthening border fortifications.' One  
24 division (the 25th Division) was reinforced after  
25 the Nomonhan Incident, but this was not by UMEZU's

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1 proposal.

2 "After the outbreak of the Pacific war  
3 (I was then the commander of the 5th Army) a con-  
4 siderable number of men was taken away from the  
5 Kwantung Army, but UMEZU told us that we should be  
6 glad to sacrifice man-power because of general con-  
7 ditions as a whole. At this time also we were un-  
8 easy because of the proportion between their strength  
9 and ours.

10 "All I have stated above is, I believe,  
11 good evidence of UMEZU's unchangeable, firm deter-  
12 mination to keep peace in the north."

13 "With the Tribunal's permission I wish to  
14 ask one or two additional questions.

15 BY MR. BLAKENEY (Continued):

16 Q Mr. Witness, when did you arrive at your  
17 post of Chief of Staff of the Kwantung Army?

18 A About three days prior to the arrival of  
19 Commanding General UMEZU.

20 Q Are you able to state the date upon which  
21 General UMEZU arrived?

22 A I think it was the 8th of September, 1939.

23 MR. BLAKENEY: You may cross-examine.

24 THE PRESIDENT: Colonel Ivanov.  
25

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## CROSS EXAMINATION

BY COLONEL IVANOV:

Q Mr. Witness, in your affidavit you give the text of UMEZU's statements made in 1939 and put them into inverted comas. Do you do this from memory, do you? Don't you?

A I do not understand, but what do you mean by putting into parenthesis?

Q You give in your affidavit the words said by UMEZU and placed them into inverted comas, and thus you quote these words. Are you doing this from memory?

A Will you tell me -- give me the subject matter because that alone -- does not enlighten me at all as to what you mean by -- if you will indicate the location and contents thereof I may be able to answer your question more intelligently.

THE PRESIDENT: He refers to UMEZU's statement, "the fire must be stopped, etc."

A (Continuing) I said this because my memory on that matter is very fresh because General UMEZU repeated this frequently.

Q There is a second UMEZU statement which is given at the end of your affidavit and which is placed also in inverted comas, that is the words, "We are in



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1 the middle of the China Incident, etc." Do you quote  
2 that also from memory?

3 A Yes, from memory.

4 Q Can the words uttered by UMEZU eight years  
5 ago and quoted by you from memory be trustworthy?  
6 Maybe this is the result of your imagination.

7 A This matter is very clearly among my  
8 recollections.

9 Q Mr. Witness, you state in your affidavit  
10 that while UMEZU for five years held the post of  
11 the commander of the Kwantung Army there was not a  
12 single border incident, didn't you?

13 A There are no important or serious border  
14 incidents.

15 Q And you, yourself, were only for three years  
16 during this period in the Kwantung Army and you take  
17 the liberty to state the facts which you did not  
18 witness?

19 A I can state very positively with respect to  
20 those three years. With respect to other matters I  
21 am able to learn through newspapers and other documents  
22 but I cannot speak of them -- whenever any incidents  
23 arise, but I cannot speak of them.

24 Q So you continue to state that at that period  
25 there was not a single border incident, do you?



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1           A    I am stating very positively that there  
2   were no serious border incidents such as the Nomonhan  
3   Incident and the Changkufeng Incident and the  
4   Chang Kan-tzu Incident.

5           COLONEL IVANOV: Your Honor, in my following  
6   questions I will use facts, or I will use data given  
7   in exhibit 750. These are information concerning the  
8   number of violations of the U.S.S.R. border --  
9   received from the chief of the frontier guard corps  
10  of the U.S.S.R., commander of the frontier guard corps  
11  of the U.S.S.R.

12          Q    Mr. Witness, do you know that the Japanese  
13  military in 1940 violated the Soviet state border  
14  fifty-nine times?

15          A    I do not know.

16          Q    And do you know that in 1941 there were 136  
17  violations of the state border? In 1942, 229 viola-  
18  tions; in 1943 the number of violations was at its  
19  highest from 1932 and that was 414 violations of the  
20  state border of the Soviet Union by the Japanese  
21  military?  
22

23          A    I do not know.

24          Q    Do you know, Mr. Witness, that during the  
25  violations of territorial waters of the U.S.S.R. in  
  1940 the Soviet authorities held up eighteen ships and

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1 in 1942 thirty-six ships?

2 A I do not know.

3 Q Mr. Witness, do you know that the number  
4 of violations of the state border of the U.S.S.R.  
5 by Japanese planes increased continuously and was  
6 as follows: in 1940 fifty-six violations; in 1940  
7 sixty-one violations; in 1942 eighty-two violations,  
8 and in 1943 one hundred nineteen violations of the  
9 Soviet state border?

10 A I do not know.

11 Q Does your memory fail you that you do not  
12 remember the violations of the Soviet frontier which  
13 occurred at the time you were chief of staff at the  
14 headquarters of the Kwantung Army?

15 A I do not remember such figures as just given.

16 Q In your affidavit you state that the cause  
17 of the incidents at the state borders were the  
18 expenditure of the so-called special secret funds.  
19 Won't you state for what purposes was these funds  
20 assigned -- were these funds spent -- correction?  
21  
22  
23  
24  
25

1 MR. BLAKENEY: Counsel is now attempting to  
2 cross-examine on a portion of the affidavit not read  
3 in evidence and I, therefore, object.

4 THE PRESIDENT: It was tendered in evidence  
5 but not read. He can cross-examine on it at the present  
6 stage. It is still in evidence, although not read.

7 Q Will you answer this question?

8 A According to the prosecutor there seems to  
9 be some relation -- he seems to point to some relation-  
10 ship between border incidents and special funds. I  
11 have not spoken about that in my affidavit.

12 THE PRESIDENT: No. He refers to undesirable  
13 incidents and what they are we do not know.

14 Q I will put a more direct question to you.  
15 Were not these funds spent on financing the subversive  
16 activities against the Soviet Union?

17 A I have no recollection that it was used for  
18 strategic purposes against the Soviet Union, that is  
19 to say, for any subversive purposes against the Soviet  
20 Union.

21 Q Mr. Witness, do you remember what questions  
22 were discussed in February, 1940, in Harbin at the  
23 conference of the chiefs of the Japanese Special  
24 agencies -- Special Service Agency?

25 A I do not know.

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1 Q I will remind you. I will read an excerpt  
2 from exhibit 736 bearing upon the materials of the  
3 conference of the chiefs of the Japanese Special  
4 Service organizations in February, 1940. I quote  
5 page 1:

6 "Revision of the Anti-Soviet Sabotage  
7 activities and of guidance of White Russians in keep-  
8 ing with the revisions.

9 "Army Special Service Organization at Harbin.

10 "A Reform of the Anti-Soviet sabotage activ-  
11 ities. The idea we have hitherto had regarding the  
12 anti-Soviet sabotage activities was to use the individual  
13 sabotage units under the direct leadership of the  
14 Japanese military authorities. However, to make this  
15 more effective in future, it is advantageous to establish  
16 a Far East Anti-Comintern Self-government simultaneously  
17 with the commencement of hostilities, to unite various  
18 kinds of sabotage activities by this, and to add  
19 political meanings to this."

20 Was not a special personnel prepared for the  
21 purpose of administering -- trained for the purposes  
22 of administration of Soviet territory which it was  
23 planned to seize with the help of the Japanese troops  
24 and was not this personnel trained under the super-  
25 vision of UMEZU and the chief of the Harbin military

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1 mission in 1942 -- Harbin Special Service Organization?

2 A Such personnel was not being trained.

3 Q Will you tell whether the chief of Harbin  
4 Special Service Organization was directly subordinated  
5 to UMEZU as commander of the Kwantung Army?

6 A He was directly under the command of the  
7 commanding general.

8 Q Did you, as chief of staff of the Kwantung  
9 Army at that period, supervise the activities of  
10 special service organizations?

11 A I have not engaged in their guidance.

12 Q Did you have any knowledge of the activities  
13 of these special service organizations, or you forgot  
14 about them?

15 A The fact that there was a conference of chiefs  
16 of special service organs in 1940 does not remain in  
17 my memory. I have forgotten it entirely. I do not  
18 remember anything about it. February 1940.

19 Q Mr. Witness, do not you know that as early as  
20 in the beginning of 1938 TOJO and UMEZU were concerned  
21 with construction of fortifications directed against  
22 the Soviet Union?

23 A I do not know of them, but General UMEZU's  
24 arrival was in September, 1939.

25 Q Yes, but in 1938 UMEZU was Vice War Minister



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1 of Japan and was concerned with the activities of the  
2 Kwantung Army, was not he? I will remind you of it.  
3 I will read to you an excerpt from secret telegram of  
4 the chief of staff of the Kwantung Army TOJO to Vice  
5 War Minister UMEZU. I quote exhibit 719, page 1-a,  
6 second paragraph:

7 "The establishment of anti-Soviet fortifica-  
8 tions is scheduled to be made during 1938 and 1939  
9 on the spots not yet started as well as the spots regarded  
10 as specially important among the locations of fortifica-  
11 tions mentioned in Special Order No. 301."

12 Did you know about the program of the construc-  
13 tion of fortifications on the U.S.S.R. state border?

14 THE PRESIDENT: Major Blakeney.

15 MR. BLAKENEY: I object to questions concerning  
16 fortifications in 1938 or '39 which was entirely prior  
17 to any period mentioned by this witness in his testimony  
18 in chief.

19 COLONEL IVANOV: Your Honor, in his affidavit  
20 the witness tries to connect the question of the con-  
21 struction of fortifications made on the Soviet state  
22 border at the time he was chief of staff of the  
23 Kwantung Army with another matter, with the losses  
24 which were suffered -- great losses which were suffered  
25



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1 by the Kwantung Army during the incidents of 1938-  
2 1939, and I think it pertinent to ask him whether the  
3 fortifications were being built prior to the losses  
4 of which he speaks and how **does** he explain the reasons  
5 for the building of these fortifications -- correction:  
6 prior to the losses by which he tries to explain the  
7 building of these fortifications.

8 THE PRESIDENT: Refer me, will you, to the  
9 part of the affidavit on which you rely.

10 COLONEL IVANOV: Your Honor, I withdraw this  
11 question. I refer the Tribunal to exhibit 779 and ask  
12 them to use this exhibit while estimating the value of  
13 the witness' testimony.

14 By this I finish my cross-examination.

15 THE PRESIDENT: Witness, in answer to the  
16 Russian prosecutor you said you did not remember or  
17 did not know of the border incidents which he alleged.  
18 Do you deny that those border incidents occurred?

19 THE WITNESS: There were no serious border  
20 incidents. However, there were occasions when spies  
21 crossed the border or that airplanes crashed in the  
22 vicinity of the border.  
23  
24  
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2 1939, and I think it pertinent to ask him whether the  
3 fortifications were being built prior to the losses  
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16 Russian prosecutor you said you did not remember or  
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22 vicinity of the border.  
23  
24  
25

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3 fortifications were being built prior to the losses  
4 of which he speaks and how does he explain the reasons  
5 for the building of these fortifications -- correction:  
6 prior to the losses by which he tries to explain the  
7 building of these fortifications.

8 THE PRESIDENT: Refer me, will you, to the  
9 part of the affidavit on which you rely.

10 COLONEL IVANOV: Your Honor, I withdraw this  
11 question. I refer the Tribunal to exhibit 779 and ask  
12 them to use this exhibit while estimating the value of  
13 the witness' testimony.

14 By this I finish my cross-examination.

15 THE PRESIDENT: Witness, in answer to the  
16 Russian prosecutor you said you did not remember or  
17 did not know of the border incidents which he alleged.  
18 Do you deny that those border incidents occurred?

19 THE WITNESS: There were no serious border  
20 incidents. However, there were occasions when spies  
21 crossed the border or that airplanes crashed in the  
22 vicinity of the border.  
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THE PRESIDENT: Major Blakeney.

REDIRECT EXAMINATION

BY MR. BLAKENEY:

Q Continuing on the subject of border incidents, Mr. Witness, do we understand, then, that during the years in question there were crossings of the border by individuals or small groups?

A In my recollection there were frequent crossings of the border by airplane by the Soviet Air Force; and there were also frequent incidents in which Soviet citizens -- probably soldiers; I do not know -- came into Manchukuo territory and attacked Manchurian citizens -- abducted Manchurian citizens.

THE MONITOR: "Attacked" should be deleted.

Q What was it, "abducted"?

A Abducted.

Q Now, I refer you, Mr. Witness, to prosecution exhibit 751, from which the Soviet prosecutor quoted some figures to you. I want to call your attention to the fact that this document shows that in the year 1939 there were 387 individuals, Japanese, who violated the Russian frontier. That is the year, is it not, of the Nomonhan Incident?

A I do not think that such a thing occurred.

Q But answer me. That was the year, was it not,

1 of the Nomonhan Incident?

2 A Yes.

3 Q And the same exhibit, 751, shows that in  
4 the year 1938, 124 Japanese violated the Soviet  
5 frontier. That is the year, is it not, of the Changku-  
6 Feng Incident?

7 A Yes.

8 MR. BLAKENEY: No further re-examination.  
9 May the witness be excused on the usual  
10 terms?

11 THE PRESIDENT: He is excused accordingly.  
12 (Whereupon, the witness was excused.)

13 MR. BLAKENEY: The document referred to in  
14 the last two questions should have been exhibit 750,  
15 although the Clerk's copy shows it to be 751.

16 THE PRESIDENT: We have it noted as 750.

17 MR. BLAKENEY: And in connection with that  
18 evidence, I wish to call attention to page 7746 of the  
19 record, where the President characterized that document  
20 as "bare assertion."

21 I now call as a witness YAMAMURA, Haruo,  
22 whose testimony is embodied in defense document 1152.  
23

24 - - - -  
25

YAMAMURA

DIRECT

1 H A R U O Y A M A M U R A, called as a witness  
2 on behalf of the defense, being first duly  
3 sworn, testified through Japanese interpreters  
4 as follows:

## 5 DIRECT EXAMINATION

6 BY MR. BLAKENEY:

7 Q Mr. Witness, please state your name and  
8 residence.

9 A My address, No. 481, 4-Chome, Saginomiya,  
10 Nakano-ku, Tokyo. My name, YAMAMURA, Haruo.

11 Q I will ask that you be handed defense document  
12 1152, and that you examine that and state whether it  
13 is your affidavit, signed and sealed by you?

14 A This document bears my signature and seal.

15 Q And are the contents thereof true and correct?

16 A Yes.

17 MR. BLAKENEY: The affidavit, defense document  
18 1152, is offered in evidence.

19 THE PRESIDENT: Admitted on the usual terms.

20 CLERK OF THE COURT: Defense document 1152  
21 will receive exhibit No. 2680.

22 (Whereupon, the document above  
23 referred to was marked defense exhibit  
24 No. 2680 and received in evidence.)  
25



YAMAMURA

DIRECT

1 MR. BLAKENEY: I now read the exhibit 2680,  
2 omitting formal parts, as follows:

3 "I am YAMAMURA, Haruo, former Lieutenant Gen-  
4 eral in the Japanese Army. From November 1941 to  
5 August 1943 I was commander of the 7th Independent  
6 Garrison Force, stationed in Chiamussu, an important  
7 place in northeastern Manchuria. My duty was to  
8 guard the Soviet-Manchurian border in Sankiang.  
9 The 7th Independent Garrison Force was under the command  
10 of General UMEZU, Commander-in-Chief of the Kwantung  
11 Army.

12 "During this period General UMEZU repeatedly  
13 stressed the importance of keeping peace with the  
14 U.S.S.R., with the result that his peaceful attitude  
15 towards the U.S.S.R. was well known throughout the  
16 Kwantung Army. It was well understood by all officers  
17 and men that General UMEZU had been especially selected  
18 as Commander-in-Chief of the Kwantung Army after the  
19 Nomonhan Incident for the purpose of insuring peace. He  
20 held frequent conferences of army commanders, division  
21 commanders and other unit commanders -- if I remember  
22 correctly, there were five or six army commanders' con-  
23 ferences during the time I was in Manchukuo -- at  
24 which he repeatedly instructed the commanders not to  
25 cause or permit any trouble with the Soviet forces.

YAMAMURA

DIRECT

1 MR. BLAKENEY: I now read the exhibit 2680,  
2 omitting formal parts, as follows:

3 "I am YAMAMURA, Haruo, former Lieutenant Gen-  
4 eral in the Japanese Army. From November 1941 to  
5 August 1943 I was commander of the 7th Independent  
6 Garrison Force, stationed in Chiamussu, an important  
7 place in northeastern Manchuria. My duty was to  
8 guard the Soviet-Manchurian border in Sankiang.  
9 The 7th Independent Garrison Force was under the command  
10 of General UMEZU, Commander-in-Chief of the Kwantung  
11 Army.

12 "During this period General UMEZU repeatedly  
13 stressed the importance of keeping peace with the  
14 U.S.S.R., with the result that his peaceful attitude  
15 towards the U.S.S.R. was well known throughout the  
16 Kwantung Army. It was well understood by all officers  
17 and men that General UMEZU had been especially selected  
18 as Commander-in-Chief of the Kwantung Army after the  
19 Nomonhan Incident for the purpose of insuring peace. He  
20 held frequent conferences of army commanders, division  
21 commanders and other unit commanders -- if I remember  
22 correctly, there were five or six army commanders' con-  
23 ferences during the time I was in Manchukuo -- at  
24 which he repeatedly instructed the commanders not to  
25 cause or permit any trouble with the Soviet forces.

YAMAMURA

DIRECT

1 Such instructions were also given on every other  
2 possible occasion. General TOGAWA conveyed General  
3 UMEZU's attitude toward the Soviet at one conference  
4 as follows: 'Commander-in-Chief UMEZU, emphasizing  
5 the necessity of not causing any trouble with the  
6 Soviet, has expressed his strong intention to severely  
7 punish and discharge anyone who in any way takes a pro-  
8 vocative move against the Soviet.'

9 "In accordance with General UMEZU's instruc-  
10 tions, I made every effort to impart this will to my  
11 men, and General UMEZU's principles were faithfully  
12 carried out by officers and men. At no time during my  
13 service under the Kwantung Army was there a border  
14 incident of importance.

15 "The time of my arrival in Chiamussu (November  
16 1941) was three months after the Kan-tokuen had been  
17 put into effect. However, I did not hear anything  
18 special about the Kan-tokuen from my direct superior  
19 officer, Lieutenant General TOGAWA, Jiro, Commander  
20 of the 10th Division, and I did not notice any evidence  
21 of anything out of the ordinary in the condition or  
22 attitude of the troops, or such as would indicate any  
23 expectation of fighting. In fact, as a troop commander  
24 I was somewhat concerned over the state of relaxation  
25 of the troops, in view of the danger of any possible

YAMAMURA

DIRECT

1 Soviet attack. My inspections of the border upon my  
2 arrival did not disclose any unusual signs. If attacked  
3 by the U.S.S.R. they were ready to fight to the end,  
4 as was their duty, but there was not the faintest  
5 indication of the Japanese side initiating any moves.

6 "Guard duty by troops stationed along the bor-  
7 der was carried out according to the 'Sankiang District  
8 Border Guard Regulations,' which were developed from  
9 the 'Border Guard Regulations,' first formulated and  
10 laid down by General UMEZU, to fit the conditions on  
11 the spot. Even if the Soviet Union should illegally  
12 cross the border (center of the current of the Amur  
13 River) they were strictly not to be fired at. The  
14 Soviet movements were to be watched and ascertained  
15 and stopped if they came to the Manchukuoan bank of  
16 the river. Thus, utmost care was taken to avoid any  
17 fighting. Guards acting as pilots were stationed on  
18 river boats plying between Harbin and Peiho to assure  
19 completely against these vessels trespassing into Soviet  
20 territory or territorial waters.

21 "The area which I was responsible for guarding  
22 in Sankiang Province was very large in proportion to  
23 the number of men available for guard purposes. The  
24 7th Independent Garrison Force had only the peacetime  
25 strength of two infantry battalions and one artillery

YAMAMURA

DIRECT

1 battalion, and facilities were so poor even for carry-  
2 ing out defense duties that I suggested reinforcements  
3 whenever I had the opportunity to do so."

4 I should like to put one or two additional  
5 questions to this witness.

6 Q What was the approximate length of the border  
7 guarded by your garrison force, Mr. Witness?

8 A Approximately 800 kilometers.

9 Q And what was your total strength in men with  
10 the two infantry battalions and one artillery battlaion  
11 which you mentioned?

12 A According to the organization table of two  
13 infantry battalions and one artillery battalion, the  
14 total strength was about 2,500 men.

15 Q And, lastly, were you ever given the reinforce-  
16 ments which you say that you repeatedly requested?

17 A No.

18 MR. BLAKENEY: You may cross-examine.

19 THE PRESIDENT: We will recess for fifteen  
20 minutes.

21 (Whereupon, at 1445, a recess was  
22 taken until 1500, after which the proceedings  
23 were resumed as follows:)  
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YAMAMURA

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MARSHAL OF THE COURT: The International  
Military Tribunal for the Far East is now resumed.

THE PRESIDENT: Colonel Ivanov.

CROSS-EXAMINATION

BY COLONEL IVANOV:

Q Mr. Witness, you were, weren't you, the  
commanding officer of the 7th Separate Detachment  
and could be present only at the conferences held  
by the commander of the 10th Division?

A It is not the 8th or the 10th. Yes.

Q You were not present at the conference of  
the commanding generals of the armies held by  
General UMEZU?

A I did not attend.

Q You heard from the commander of the 10th  
Division, General TOGAWA, Jiro, about the conferences  
of the commanding generals of the armies held by  
General UMEZU, and he told you that there were five  
or six such conferences at that time, is it not so?

A I know that there were five or six conferences  
from documents, and there were five or six within my  
personal knowledge.

Q Tell me, Mr. Witness, General TOGAWA, Jiro  
was only the commanding general of a division and  
could not be present at the conferences of the



YAMAMURA

CROSS

1 commanding generals of the armies and heard about them  
2 from a commanding general of one of the armies.

3 A Not so. They personally attended; that is,  
4 he personally attended.

5 Q I repeat, at the conferences of the command-  
6 ing generals of the armies which were held by General  
7 UMEZU.

8 A He attended those conferences.

9 Q Thus, all that you state in your affidavit  
10 concerning instructions issued originally by General  
11 UMEZU, you say from words of General TOGAWA, Jiro,  
12 that is, from hearsay, isn't that so?

13 A I heard from TOGAWA by document and personally  
14 and frequently from him verbally.

15 Q In your affidavit, you quote word by word the  
16 contents of General TOGAWA's speech on the attitude  
17 of General UMEZU toward the Soviet Union. Did you  
18 record this speech?

19 A Yes.

20 Q Can you, after five years, quote from memory  
21 the actual text of General TOGAWA's speech when, in  
22 your affidavit, you could not state whether it was  
23 five or six conferences that were held by General  
24 UMEZU? How can we rely on the truth of your re-  
25 collections?

YAMAMURA

CROSS

1 THE PRESIDENT: Well, his answers will not  
2 help in this matter. That is a matter for comment.

3 Q Do you know, Mr. Witness, that General  
4 UMEZU was of the opinion that Japanese attitude to-  
5 wards the Neutrality Pact with the Soviet Union must  
6 change as soon as changes in relations between Ger-  
7 many and the Soviet Union took place?

8 A I do not know.

9 Q I will read to you an excerpt from exhibit  
10 1086 which is telegram sent by Ambassador Ott to  
11 Reich Minister Ribbentrop on June 11, 1941. That  
12 is eleven days before Germany had attacked the Soviet  
13 Union. I quote:

14 "Prince URACH has informed us of a conver-  
15 sation with the Commander-in-Chief of the Kwantung  
16 Army, General UMEZU, in Hsinking: Commander-in-  
17 Chief of the Kwantung Army, General UMEZU, stressed  
18 that he welcomed the Neutrality pact Japan-Russia  
19 for the moment. Since, however, the Tripartite  
20 pact is the unchangeable basis of Japanese foreign  
21 policy, Japan's attitude towards the Neutrality pact  
22 must undergo a change just as soon as the hitherto  
23 existing German-Russian relations undergo an alt-  
24 eration. Ott."

25 Mr. Witness, what post did you hold and where

YAMAMURA

CROSS

1 were you in summer and autumn, 1941?

2 A I was commander of the 13th Mixed Brigade  
3 in Central China.

4 Q When and from whom have you heard about  
5 Kantokuen for the first time?

6 Why do you hesitate? You mentioned this  
7 name in your affidavit.

8 A I did not hear of it definitely from any  
9 particular person.

10 Q In your affidavit, you state that you  
11 arrived at Chiamussu in November of 1941. That is  
12 three months later, after Kantokuen was in force.  
13 Will you tell, then, this, what month was the  
14 Kantokuen Plan drafted and in what month of 1941  
15 was it enforced?

16 A I recollect that it was around the end of  
17 July, 1941.

18 Q Do you know that General UMEZU was directly  
19 connected with the effectuation of Kantokuen?

20 A I do not understand the purport of the  
21 question very well.

22 Q Let's pass on to the next question, then.

23 Do you know that according to the Kantokuen  
24 the Kwantung Army received several hundred thousand  
25 men in reinforcements out of the number of the

YAMAMURA

CROSS

1 mobilized persons and that establishments of all the  
2 divisions of the Kwantung Army were increased up to  
3 the pre-war size? Do you know about that?

4 THE PRESIDENT: He was only a garrison  
5 commander with a few battalions under him. There  
6 are others who can answer that more satisfactorily.

7 Q Mr. Witness, do you know that in 1941, the  
8 discharge of the officers serving their term --  
9 soldiers -- the dischargement of soldiers having  
10 served their term was ceased?

11 A Yes.

12 Q Mr. Witness, will you tell me, was your  
13 predecessor relieved from the post of commander of  
14 the detachment and you appointed to this post -- and  
15 you were appointed on this post in connection with  
16 the Kantokuen Plan?

17 A I do not know anything about my predecessor,  
18 and I had no connections with the putting into effect  
19 of that plan.

20 Q You were commanding officer of the Separate  
21 Detachment and you didn't know that there was a plan  
22 drafted in the Kwantung Army -- a plan of a war  
23 against the USSR in 1942, confirmed by General  
24 UMEZU -- sanctioned by General UMEZU. That is why  
25 you did not speak about this question in your affi-

YAMAMURA

CROSS

1     davit, is that so?

2             A     I do not know anything about that.

3             Q     But, you should have known that in 1942  
4     in the Kwantung Army there were formed first and  
5     second fronts -- or area armies and somewhat later,  
6     third area army, wasn't it so?

7             MR. BLAKENEY: If the Tribunal please,  
8     counsel is merely arguing with the witness. I do  
9     not think these are proper questions.

10            THE PRESIDENT: That objection is upheld.

11            Q     Mr. Witness, wasn't it because you were on  
12     the unimportant sector that you didn't know anything  
13     about the preparation for a war against the USSR and  
14     knew so little about it and about other measures?

15            THE PRESIDENT: That negative type of  
16     question, if answered, is of no assistance.

17            COLONEL IVANOV: With that, I conclude cross-  
18     examination.

19            MR. BLAKENEY: May the witness be released  
20     on the usual terms?

21            THE PRESIDENT: He is excused accordingly.

22                    (Whereupon, the witness was ex-  
23     cused.)  
24

25                    - - -

                  MR. BLAKENEY: I now call as a witness



BLAKE

1 Lieutenant Colonel H. C. Blake of the U. S. Army.

2 THE PRESIDENT: Major Blakeney, has this  
3 man signed an affidavit?

4 MR. BLAKENEY: No, sir.

5 THE PRESIDENT: In chambers, I told you not  
6 to bother getting affidavits from these American and  
7 other western witnesses for the time being, but I  
8 do not know what view my colleagues take.

9 MR. BLAKENEY: Yes, sir. This is the wit-  
10 ness who was in question at that hearing in chambers.

11 THE PRESIDENT: Well, call him, and there  
12 may be no objection taken. I do not know.

13 - - -

14 H O M E R C. B L A K E, Lieutenant Colonel,  
15 United States Army, called as a witness on  
16 behalf of the defense, being first duly sworn,  
17 testified as follows:

18 MR. TAVENNER: If the Tribunal please, I  
19 do want to raise the objection that we have not been  
20 served with copy of the affidavit.

21 MR. BLAKENEY: As I stated, there is no  
22 affidavit, because the defense is relying on what  
23 it assumed to be its right to call English-speaking  
24 witnesses without the production of affidavits.

25 THE PRESIDENT: We have insisted on English

BLAKE

1 witnesses speaking on affidavits where they have had  
2 a lot to say and have produced a lot of documents.  
3 This man seems to have a lot of documents, to say  
4 the least. Perhaps I should not say we insisted.  
5 The prosecution applied to us that that course be  
6 followed, and we ordered it in spite of the defense  
7 attitude.  
8

9 MR. BLAKENEY: Yes. Special permission was  
10 granted to the prosecution, and we objected then be-  
11 cause we did not think then and we do not think now  
12 that it is conducive to the best presentation of the  
13 case in the case of English-speaking witnesses, to  
14 require their testimony to be recorded. The testi-  
15 mony of this witness will be quite brief, and it  
16 will be readily apparent that it could not be re-  
17 duced to writing in the form of an affidavit without  
18 being objectionable under the rules of the Tribunal.

19 THE PRESIDENT: You said his evidence would  
20 be brief, Major Blakeney?

21 MR. BLAKENEY: That is correct, sir.

22 MR. PRESIDENT: How long will it take?

23 MR. BLAKENEY: I assume the testimony in  
24 chief will take thirty to forty minutes at most,  
25 perhaps less.

1 MR. TAVENNER: If the Tribunal please, may  
2 I be heard on the matter before there is a decision?

3 THE PRESIDENT: Yes.

4 MR. TAVENNER: It occurs to me that the  
5 matter of briefness of the affidavit should not be  
6 the controlling factor. When an affidavit is brief  
7 and when it is not may be a very difficult matter to  
8 determine. We see no difference in principle at all  
9 between an English-speaking witness and one who is  
10 not as far as the expedition of the trial is concerned.  
11 Distinguished counsel has stated that they relied  
12 upon their right to produce an English-speaking  
13 witness to testify by word of mouth but this does  
14 not appear to be exactly correct in view of the  
15 ruling of the President of the Tribunal in Chambers  
16 quite some time ago as to this particular witness.

17 THE PRESIDENT: I do not recollect what I  
18 said in Chambers other than at the time being Major  
19 Blakeney need not prepare an affidavit, but I did  
20 not know what my colleagues thought. We will hear  
21 him orally but I am basing that on Major Blakeney's  
22 assurance that his evidence will only take half an  
23 hour. We would waste more time in getting an affidavit  
24 and getting it processed and distributed, more time and  
25 material, than if we decide to hear him now and he

1 does not take more than half an hour. This vote,  
2 of course, is based on the fact of this particular  
3 case.

4 DIRECT EXAMINATION

5 BY MR. BLAKENEY:

6 Q Mr. Witness, state your name and official  
7 position, please.

8 A Lieutenant Colonel Homer C. Blake, Chief  
9 of the Order of Battle Section, Assistant Chief of  
10 Staff, G-2, General Headquarters, Far Eastern  
11 Command.

12 Q Is G-2, GHQ, Far Eastern Command, the  
13 Intelligence Section of General Headquarters, the  
14 official repository of various estimates of order  
15 of battle and strength of Japanese armed forces,  
16 estimates made by the United States War Department and  
17 subordinate agencies thereof during the war of 1941-  
18 1945?

19 A It is.

20 Q Are you as Chief of the Order of Battle  
21 Section of G-2 familiar with those documents?

22 A I am.

23 Q Are those estimates based upon data and  
24 sources of information available to the War Department  
25 and the field commands and commonly utilized in

BLAKE

DIRECT

1 military intelligence in compiling enemy order of  
2 battle?

3 A They are.

4 Q Did the estimates so made serve as the  
5 basis of planning for operations of the United  
6 States and Allied Forces during the war?

7 A They were, of course, so used.

8 Q Were these estimates confirmed by informa-  
9 tion which became available upon the surrender of  
10 Japan as having been reasonably accurate?

11 A They were proved to have been reasonably  
12 accurate.

13 Q For what period of time are such estimates  
14 available among the records in the custody of G-2?

15 A 1943 until 1945.

16 Q Have you brought with you some of those  
17 estimates?

18 A I have.

19 Q Are the documents containing them  
20 subject to a military security classification?

21 A The documents contain classified military  
22 information.

23 Q I ask you to consult the documents which  
24 you have with you and to give the Tribunal therefrom  
25 the following data: the estimates of the strength of



BLAKE

DIRECT

1 the Japanese Kwantung Army and the Korea Army,  
2 mentioning also the number of divisions, brigades  
3 and other large units under the command of each for  
4 each quarter of the years 1943-1945 inclusive. Please  
5 add the estimated number of aircraft in Manchuria and  
6 Korea for each of those dates.

7 A 31 May 1943:

8 Manchuria -- 500,000 men, 22 divisions,  
9 3 brigades, 7 tank regiments.

10 Korea -- 1 division, 50,000 men.

11 Manchuria and Korea -- 405 planes.

12 31 July 1943

13 Manchuria -- 450,000 men, 14 divisions,  
14 1 cavalry brigade, 13 border garrisons.

15 Korea -- 1 division, 45,000 men.

16 Manchuria and Korea -- 195 planes.

17 30 September 1943

18 Manchuria -- 550,000 men, 14 divisions,  
19 1 cavalry brigade, 13 border garrisons.

20 Korea -- 45,000 men, 1 division.

21 Manchuria and Korea -- 216 planes.

22 31 December 1943

23 Manchuria -- 750,000 men, 14 divisions,  
24 1 cavalry brigade, 13 border garrisons.

25 Korea -- 65,000 men, 2 divisions.

BLAKE

DIRECT

1 Manchuria and Korea -- 150 planes.  
2 31 January 1944  
3 Manchuria -- 750,000 men, 14 divisions,  
4 1 cavalry brigade, 13 border garrisons.  
5 Korea -- 65,000 men, 2 divisions.  
6 Manchuria and Korea -- 316 planes.  
7 30 April 1944  
8 Manchuria -- 785,000 men, 13 divisions,  
9 1 cavalry brigade, 13 border garrisons.  
10 Korea -- 100,000 men, 2 divisions.  
11 Manchuria and Korea -- 353 planes.  
12 31 July 1944  
13 Manchuria -- 700,000 men, 14 divisions,  
14 1 cavalry brigade, 13 border garrisons.  
15 Korea -- 100,000 men, 2 divisions.  
16 Manchuria and Korea -- 180 planes.  
17 31 October 1944  
18 Manchuria -- 660,000 men, 14 divisions,  
19 1 cavalry brigade, 13 border garrisons.  
20 Korea -- 120,000 men, 1 division.  
21 Manchuria and Korea -- 139 planes.  
22 31 January 1945  
23 Manchuria -- 660,000 men, 9 divisions,  
24 3 cavalry brigades, 13 border garrisons.  
25 Korea -- 125,000 men, no divisions.

BLAKE

DIRECT

1 Manchuria and Korea -- 159 planes.

2 30 April 1945

3 Manchuria -- 610,000 men, 8 divisions,  
4 1 cavalry brigade, 14 border garrisons.

5 Korea -- 215,000 men, 7 divisions.

6 Manchuria and Korea -- 205 planes.

7 13 August 1945

8 Manchuria -- 660,000 men, 16 divisions,  
9 2 tank regiments.

10 THE PRESIDENT: General Vasiliev.

11 A (Continuing)

12 Korea -- 5 divisions, 5 depot divisions,  
13 325,000 men.

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1 THE PRESIDENT: Is there any advantage  
2 in taking your point just at this moment?

3 GENERAL VASILIEV: I have only one  
4 question, your Honor. Will those documents which  
5 are now being read by the witness be produced to  
6 the Court?

7 THE PRESIDENT: If he is speaking from  
8 documents, and you insist, I think he must comply  
9 with the rule. Obviously, the foundation of his  
10 knowledge is documents, and documents should be  
11 produced.

12 GENERAL VASILIEV: I am quite satisfied,  
13 your Honor. Thank you.

14 MR. BLAKENEY: I do not wish by silence  
15 to suggest that the witness will produce the docu-  
16 ments.

17 THE PRESIDENT: We have considerations of  
18 security, but I do not know how far they would  
19 apply in this matter at this time.

20 MR. BLAKENEY: Of course if the documents  
21 had been available to us for production we should  
22 not have troubled to put the witness on the stand  
23 to read them.

24 THE PRESIDENT: According to English  
25 decisions, and they are very, very late, the House

BLAKE

DIRECT

1 of Lords, the word of the Secretary of State or  
2 the Foreign Secretary is taken as conclusive on  
3 the question of security. But the privilege must  
4 be raised by the Foreign Secretary or the Secretary  
5 of State. However, it is for this Tribunal to  
6 make its own laws in that regard.

7 MR. BLAKENEY: I point out that the witness  
8 has already stated that the documents which he has  
9 with him do contain classified military informa-  
10 tion, and I assume that if and when the request  
11 is made of him during cross-examination, not during  
12 examination in chief, to produce the documents he  
13 can then state the position.

14 THE PRESIDENT: To establish the privi-  
15 lege he should have a letter from the State Depart-  
16 ment or the equivalent.

17 MR. BLAKENEY: He has no connection. He  
18 is a military man.

19 THE PRESIDENT: I suppose if he tells us  
20 he is instructed to take the privilege by the proper  
21 people we will not question his word.

22 MR. BLAKENEY: Shall he complete his  
23 direct testimony?

24 THE PRESIDENT: Has he finished?

25 MR. BLAKENEY: No, sir.



BLAKE

DIRECT

1 THE PRESIDENT: Well, what is the position?  
2 Do you insist on the production of the documents?  
3 We will have to decide this question of privilege  
4 at once. Perhaps, we will have to adjourn to  
5 enable it to be determined.

6 You, General Vasiliev, insist on the pro-  
7 duction of the documents, do you?

8 GENERAL VASILIEV: Yes, your Honor, un-  
9 doubtedly.

10 THE PRESIDENT: Well, now, it is for the  
11 witness to say whether he can produce them or not,  
12 having regard to his instructions from the State  
13 Department.

14 MR. BLAKENEY: I should suggest, your  
15 Honor, that this is not the proper time for the  
16 matter to be raised. He is in the midst of testify-  
17 ing from the documents, and I would suggest that he  
18 be permitted to complete it.

19 THE PRESIDENT: Once the other side claims  
20 to see the document or to have it produced, you shut  
21 down on any evidence of the document until it is  
22 produced or its absence explained or some privilege  
23 is successfully raised. But we can do nothing until  
24 the witness tells us after consulting his superiors  
25 what his attitude is on this question of privilege.

BLAKE

DIRECT

1           Witness, are you prepared to produce  
2 these documents without further reference to  
3 authorities?

4           THE WITNESS: I am not at liberty to  
5 produce the documents, as they contain classi-  
6 fied military information.

7           THE PRESIDENT: Well, the Court will  
8 have to consider that question.

9           We will adjourn until half-past nine  
10 tomorrow morning.

11                   (Whereupon, at 1600, an adjourn-  
12 ment was taken until Tuesday, 3 June 1947,  
13 at 0930.)  
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